

Tillman, Tressa

From: Wilson, Penny [WILSON@adeq.state.ar.us]
Sent: Wednesday, February 26, 2014 2:21 PM
To: Tillman, Tressa
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)
Attachments: Georgia Pacific - Solid Waste report.pdf; Pulpmill Services - Memo to Water.pdf

Tressa,

Attached are the two complaint reports we discussed yesterday. If you have any additional questions, please do not hesitate to contact me.

Thanks,
Penny J. Wilson
Enforcement & Inspection Branch Manager
Hazardous Waste Division
Arkansas Department of Environmental Quality
501-682-0868

From: Tillman, Tressa [mailto:tillman.tressa@epa.gov]
Sent: Tuesday, February 25, 2014 4:14 PM
To: Wilson, Penny
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

Hi, Penny – I'm following up to see what the resolution was on this report of environmental concern.

Can you provide an update? Thanks! -- Tressa

From: Braun, Heinz [mailto:BRAUN@adeq.state.ar.us]
Sent: Tuesday, January 21, 2014 12:53 PM
To: Tillman, Tressa
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

As you can see below the Hazardous Waste Division will be the lead division for Arkansas. The odor is: a) indoor which we do not regulate b) hopefully should the alleged dumping be taken care of then the odor will also. An Air Inspector will accompany the team of Investigators.

From: Hynum, Tammie
Sent: Tuesday, January 21, 2014 12:50 PM
To: Braun, Heinz
Cc: Bates, Mike; Jones, Benjamin; Shafii, Mo
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

Heinz,

HW does not mind taking the lead on this investigation. However, it appears a multi-media inspection should be conducted; various media violations appear to have occurred. Penny will have an inspector contact each media to set up a time.

Thanks,
Tammie

From: Braun, Heinz
Sent: Tuesday, January 21, 2014 12:13 PM
To: Hynum, Tammie
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

Whoops wrong Tammie unless you wish to investigate? HaHa Tammie see below and let me know what you think.

From: Harrelson, Tammy
Sent: Tuesday, January 21, 2014 12:09 PM
To: Braun, Heinz
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

You sending this to me or to Tammie Hynum?

From: Braun, Heinz
Sent: Tuesday, January 21, 2014 9:27 AM
To: Harrelson, Tammy
Subject: RE: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

Tammy do you guys want to handle the dumping since if that is found you guys can handle the penalties etc. and if they are dumping and that is stopped so should the odor. We will assist if necessary?

From: Bates, Mike
Sent: Tuesday, January 21, 2014 9:23 AM
To: Braun, Heinz
Subject: FW: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

From: McAlister, Michael
Sent: Tuesday, January 21, 2014 9:19 AM
To: Bates, Mike; Harrelson, Tammy; Hynum, Tammie; Jones, Benjamin; Shafii, Mo
Cc: Bassett, Karen; Benefield, Ryan; Marks, Teresa; Carpenter, Ellen
Subject: FW: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

FYI – received the follow-up email below from EPA this morning, with a link to a local news report.

Michael McAlister
Attorney – Legal Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118
501-682-0918
mcalister@adeq.state.ar.us

From: Tillman, Tressa [<mailto:tillman.tressa@epa.gov>]
Sent: Tuesday, January 21, 2014 9:08 AM
To: McAlister, Michael
Cc: Anderson, Israel
Subject: Report of Environmental Concern - Crossett, AR, 1-16-14 (News Link)

Hi again, Mike – For your information, below is a web link from KNOE-TV8 that reports on a “black liquor” spill in Crossett, Arkansas. This is the same substance that Pastor Bouie is concerned about currently being dumped and buried in his community. Thanks! -- Tressa

<http://www.knoe.com/category/178698/video-landing-page?clipId=9751783&topVideoCatNo=127380&autoStart=true>

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From: Tillman, Tressa
Sent: Friday, January 17, 2014 8:44 AM
To: Michael McAlister (mcalister@adeq.state.ar.us)
Cc: Anderson, Israel
Subject: Report of Environmental Concern - Crossett, AR, 1-16-14

Hi, Michael – We received another call from Pastor David Bouie, Sr., of Crossett, AR. I have summarized his concerns below.

SUMMARY: EPA Region 6 received a voicemail from Pastor David Bouie, Sr. on January 16, 2014, regarding his concerns about strong odors and dumping activities at the Georgia Pacific LLC paper facility in Crossett, AR. I spoke with Pastor Bouie on January 17, 2014, and he stated that the community has been exposed to strong odors and fumes from the facility for the past 2-3 weeks. The odors are still ongoing, and Pastor Bouie said they are strong inside his home as well as outside. Pastor Bouie is also very concerned about trucks from the facility dumping “black liquid” in the area near Westview Cemetery. He is concerned that the facility is illegally dumping and burying hazardous substances in the community. The dumping is also ongoing. He said he has video of the dumping activities and would like to receive a response from ADEQ regarding his concerns. If possible, he would also like a point-of-contact with ADEQ to report concerns with the facility. He can be reached at 870-500-6640.

Please note that Pastor Bouie has requested a response from ADEQ and point-of-contact to report concerns with the facility.

Thanks! -- Tressa

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Comparison of Drinking Water Sample Data in Ouachita Riverkeeper Report with MCLs or other Health Based Levels
03/04/14

Acetone (no MCL): detected in city tap water 1839 Roberts at 5.50 ug/L; stated reference dose (RfD) is 0.9 mg/KG/day, multiplying by 2 liters per day ingestion and dividing by a 70 Kg adult weight results in a long term health advisory of 0.026 mg/L or 26 ug/L – not currently at a level of health concern

Benzene (MCL of 5 ug/L): detected in city tap water 1839 Roberts at 0.67 ug/L – not currently at a level of health concern

Bromoform (no specific MCL): detected in city tap water 1839 Roberts at 9.43 ug/L. Bromoform is part of a group of disinfection byproducts – the sum of four trihalomethanes or THMs with an MCL of 80 ug/L for the sum of all 4 THMs – not currently at a level of health concern

Dibromochloromethane (no specific MCL): detected in city tap water 1839 Roberts at 5.61 ug/L. Dibromochloromethane is part of a group of disinfection byproducts – the sum of five haloacetic acids or HAAs with an MCL of 60 ug/L for the sum of all 5 HAAs – not currently at a level of health concern

Diethyl Phthalate (no MCL for this specific phthalate): detected in city tap water 1839 at 1.63 ug/L. Phthalates are a group of plasticizers that are often detected in laboratory blanks due to leaching of such plasticizers from plastic laboratory bottles and tubing. To this point, method detection blanks showed benzyl butyl phthalate at 1.25 ug/L and Bis(2-ethylhexyl) phthalate at 16.4 ug/L. While there is no specific MCL for Diethyl Phthalate, the MCL for Bis(2-ethylhexyl) phthalate is 6 ug/L, well above the level of diethyl phthalate detected in city tap water.

Phenol (no MCL): detected in private well 111 Lawson at 0.0523 mg/L, tap water 123 Lawson at 0.0218 mg/L, church water well 1082 Ashley at 0.0082 mg/L, and city tap water 1839 at 0.0147 mg/L. Phenol is another organic contaminant that is often found in laboratory blanks at trace amounts. Furthermore, EPA has established a 10-day health advisory for phenol of 6 mg/L for not causing any adverse effects in a child and has determined that a lifetime exposure to 2 mg/L phenol in drinking water is not expected to cause any adverse effects.

[Methyl] Tertiary-Butylmethylether (MTBE) (no MCL): detected in city tap water 1839 at 78.9 ug/L. A recommended range of 20-40 ug/L of MTBE has been recommended because this is the threshold of taste and odor complaints. There is a range of over four to five orders of magnitude between this taste and odor threshold and the range of exposure expected to cause adverse effects. In other words, people will stop drinking water with MTBE contamination at levels far below the levels of health concern, due to taste and odor objection.

ADH reported violations and water system detected contaminants, per Consumer Confidence Report (CCR)
Active Community Water Systems with either Crossett in their name or Admin Address is the City of Crossett.

PWSID	AR0000017	RULE	VIO	ANALYTE	BEG	END
Sys	Crossett Water Commission	TCR	MCL, Monthly (TCR)	Coliform (TCR)	5/1/1991	5/31/1991
Type	CWS	TCR	Notification, Public	Coliform (TCR)	5/1/1991	5/31/1991
Source	Ground Water	Not Regulated	Monitoring, Check/Repeat/Confirmation	Coliform (Pre-TCR)	8/1/1981	8/31/1981
Pop	8,038					

2013 CCR Reported Contaminants

Bromoform 3.17 ppb
Dibromochloromethane 0.65 ppb
HAA5 2 ppb
TTHM 7 ppb

PWSID	AR0000022	RULE	VIO	ANALYTE	BEG	END
Sys	North Crossett Utilities	TCR	Monitoring, Routine Minor (TCR)	Coliform (TCR)	7/1/2013	7/31/2013
Type	CWS	TCR	MCL, Monthly (TCR)	Coliform (TCR)	6/1/2003	6/30/2003
Source	Ground Water	LCR	Initial Tap Sampling for Pb and Cu	Lead and Copper Rule	3/30/1993	3/30/1993
Pop	3,525	TCR	Monitoring, Routine Major (TCR)	Coliform (TCR)	1/1/1993	1/31/1993

2013 CCR Reported Contaminants

HAA5 5 ppb
TTHM 32 ppb

PWSID	AR0000023	RULE	VIO	ANALYTE	BEG	END
Sys	North East Crossett Water Assn	CCR	CCR Complete Failure to Report	CCR	10/19/1999	4/18/2000
Type	CWS					
Source	Purchased Ground Water					
Pop	160					

2013 CCR Reported Contaminants

HAA5 5.1 ppb
TTHM 54.2 ppb

PWSID	AR0000078	RULE	VIO	ANALYTE	BEG	END
Sys	West Ashley County Water Assn					
Type	CWS					
Source	Purchased Ground Water					
Pop	683					

2013 CCR Reported Contaminants

NO REPORTED VIOLATIONS

Air Program Crossett, Arkansas

Facility and Process Description:

- The Georgia-Pacific LLC - Paper Operations facility operates a kraft paper mill.
- Chips are used as a primary source.
- Round logs are also received and chipped with rejected chips burned in the mill's combination boiler.
- The removed bark is pneumatically sent to bark piles for storage and eventual use in the mill's boilers.
- The chips from the silos are conveyed to the Mill's thirteen batch digesters.
- The function of the digesters is to cook the chips using white liquor, black liquor, and the steam from the boilers.
- Concentrated black liquor is burned in the Mill's recovery furnace.
- Oil is used to start up the recovery furnace.

Air Planning:

ADEQ's CAA 111(d) Plan requirements for kraft pulp mills were approved in 1998. The Plan requires the facility to conduct compliance testing and continuous monitoring requirements for Total Reduced Sulfur (TRS) emissions.

Arkansas regional haze State Implementation Plan (RH SIP) was submitted to EPA in September 2008:

- ADEQ found that the Georgia Pacific Crossett Mill 6A Boiler is not best available retrofit technology (BART) eligible and that the 9A Boiler is BART eligible, but is not subject to BART requirements.
- The facility did not have information on the 9A Boiler's maximum 24-hour emission rate, and therefore initially modeled permit allowables in the BART screening modeling.
- This modeling showed the source exceeded the 0.5 deciview (dv) contribution to visibility impairment threshold.
- ADEQ subsequently modeled emission rates derived from stack testing, showing the source's visibility impacts were below the 0.5 dv threshold.
- Based on the latter modeling, ADEQ and the facility believed the boiler was not subject to BART.
- In our March 11, 2012 final action on the Arkansas RH SIP, we found that ADEQ did not provide a supporting technical analysis to show that the modeled emission rates from the latter modeling are representative of the actual maximum 24 hour emissions from the highest emitting day over the modeled period, and we therefore disapproved the State's determination that the 9A Boiler is not subject to BART.
- In our final action we also found that ADEQ did not provide the documentation necessary to demonstrate that the startup date of the 6A Boiler is outside of the BART eligibility window frame, and we therefore disapproved the State's determination that the 6A Boiler is not BART eligible.
- In March and April 2013, Region 6 had discussions with ADEQ and Georgia Pacific to address this issue.

- ADEQ and Georgia Pacific now agree that both the 6A and 9A Boilers are BART eligible.
- The facility modeled in 2011 the recently revised permit limits for the 6A and 9A boilers, and the modeled visibility impacts were below the 0.5 dv threshold.
- Region 6 was concerned that the facility would be circumventing the BART requirements by having revised their permit limits and modeling these to screen out of BART.
- To address our concerns and demonstrate that the 6A and 9A Boilers are not subject to BART, the facility provided a technical analysis and documentation showing that the boilers' actual emissions during the 2001-2003 regional haze baseline period were below the permit limits the facility modeled in the 2011 modeling.
- Georgia Pacific's analysis compares the modeled permit limits with estimates of 2001-2003 maximum 24-hour emission rates that were calculated based on daily fuel usage and EPA's AP-42 emission factors.
- Region 6 believes this analysis and documentation are appropriate and sufficient to support the determination that the 6A and 9A boilers are not subject to BART.
- When ADEQ submits a RH SIP revision to address our partial disapproval of the 2008 RH SIP, it will have to include the technical analysis, modeling, and other documentation provided by Georgia Pacific in support of the not subject to BART determination for the 6A and 9A boilers.

Air Permit:

Permit History and Status:

- The first paper machine at Georgia-Pacific Crossett Paper Operations at 100 Mill Supply Road, Crossett, AR 71635 in Ashley County was constructed in 1937.
- On March 27, 1970, Georgia-Pacific was issued its first permit, Permit #16-A.
- Currently, the facility has an ADEQ Title V operating permit (Permit No. : **Error! Reference source not found.**).
- The current permit is effective from - .
- This facility is not currently required to have a GHG permit.

Permit Limits and Requirements:

Applicable Requirements:

- Note: H₂S is not classified as a Hazardous Air Pollutant (HAP)
- MACT I – Controlling HAP emissions from production areas using kraft, sulfite, semi-chemical, and soda pulping processes
- MACT II (Subpart MM) – Controlling HAP emissions from pulping recovery combustion areas
- MACT III – Controlling HAP emissions from production areas using mechanical, secondary fiber, and non-wood pulping, and papermaking systems
- Kraft Pulp Mill NSPS – controlling PM and TRS
- Boiler MACT: Subpart 5D establishes requirements to demonstrate initial and continuous compliance with national emission limits and work practice standards for HAPs emitted from industrial, commercial, and institutional boilers. It becomes effective in February 2014.

Actual Requirements in the current operating permit for Georgia Pacific:

- NESHAP Subpart S or Cluster Rule (Pulp and Paper Industry or MACT I & III) since 1999 on their second Title V permit: TRS
- NESHAP Subpart MM for Chemical Recovery Combustion Sources at Kraft, Sulfite, and Stand-Alone Semi-chemical Pulp Mills (MACT II) : PM (surrogate for HAP metals), VOC, CO, SO₂, NO_x for smelt tanks, evaporator recovery furnaces that are used for combustion spent pulping liquor; THC (surrogate for gaseous organic HAPs)
- Compliance Assurance Monitoring has been required for the two largest boilers and their two incinerators/scrubbers since 2003

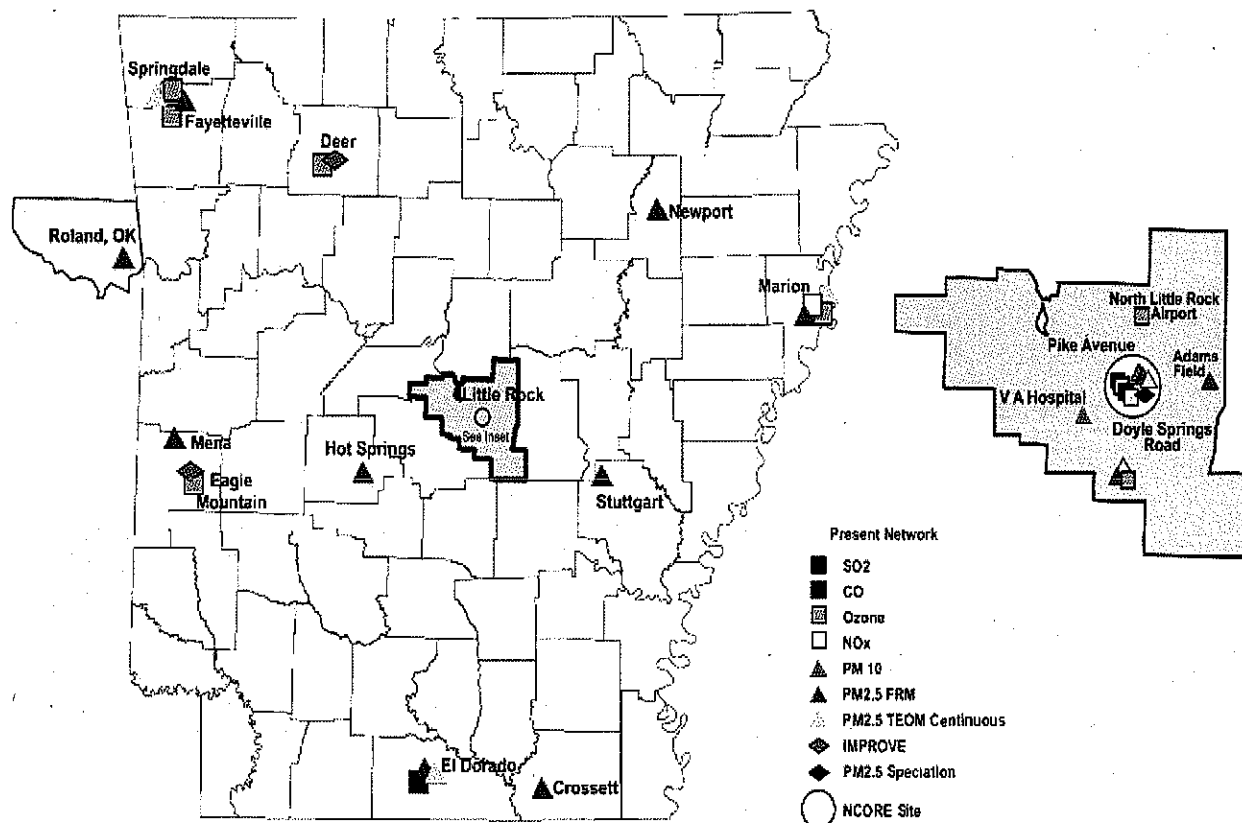
Permit Emission Limits

Pollutant	tpy
PM	1,403.5
PM ₁₀	1,372.6
SO ₂	1,037.4
VOC	3,209.3
CO	11,484.5
NO _x	5,522.4
Pb	0.53
TRS*	130.7

* Total reduced sulfur (TRS) – sum of the sulfur compounds hydrogen sulfide, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide

Air Monitoring:

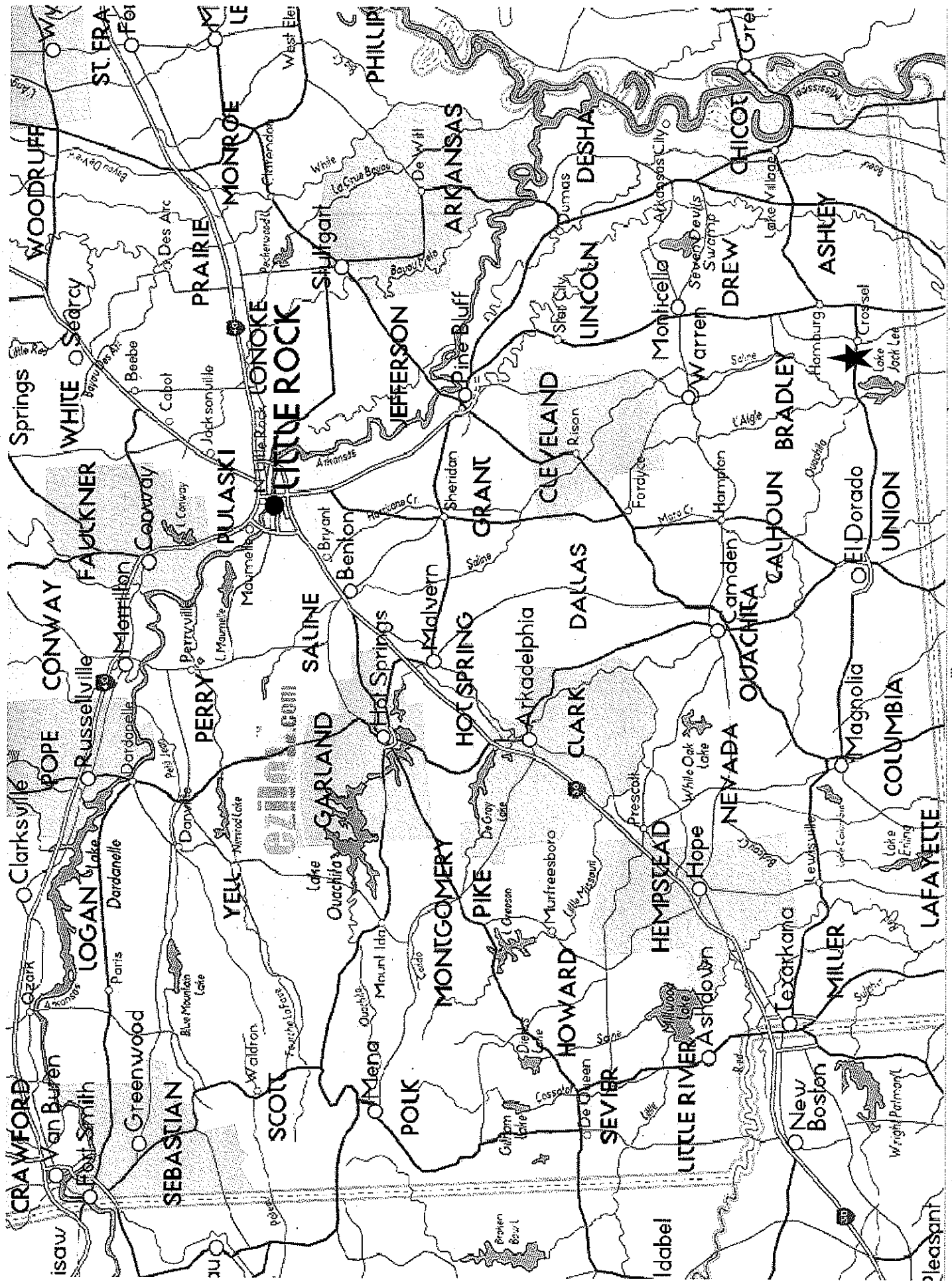
ADEQ runs a PM_{2.5} ambient air monitor in Crossett, Arkansas. The 2010 – 2013 preliminary annual design value is 10 ug/m³ (NAAQS is 12.0 ug/m³). The closest SO₂ monitor to Crossett is in El Dorado, Arkansas over 100 miles away.



Georgia Pacific

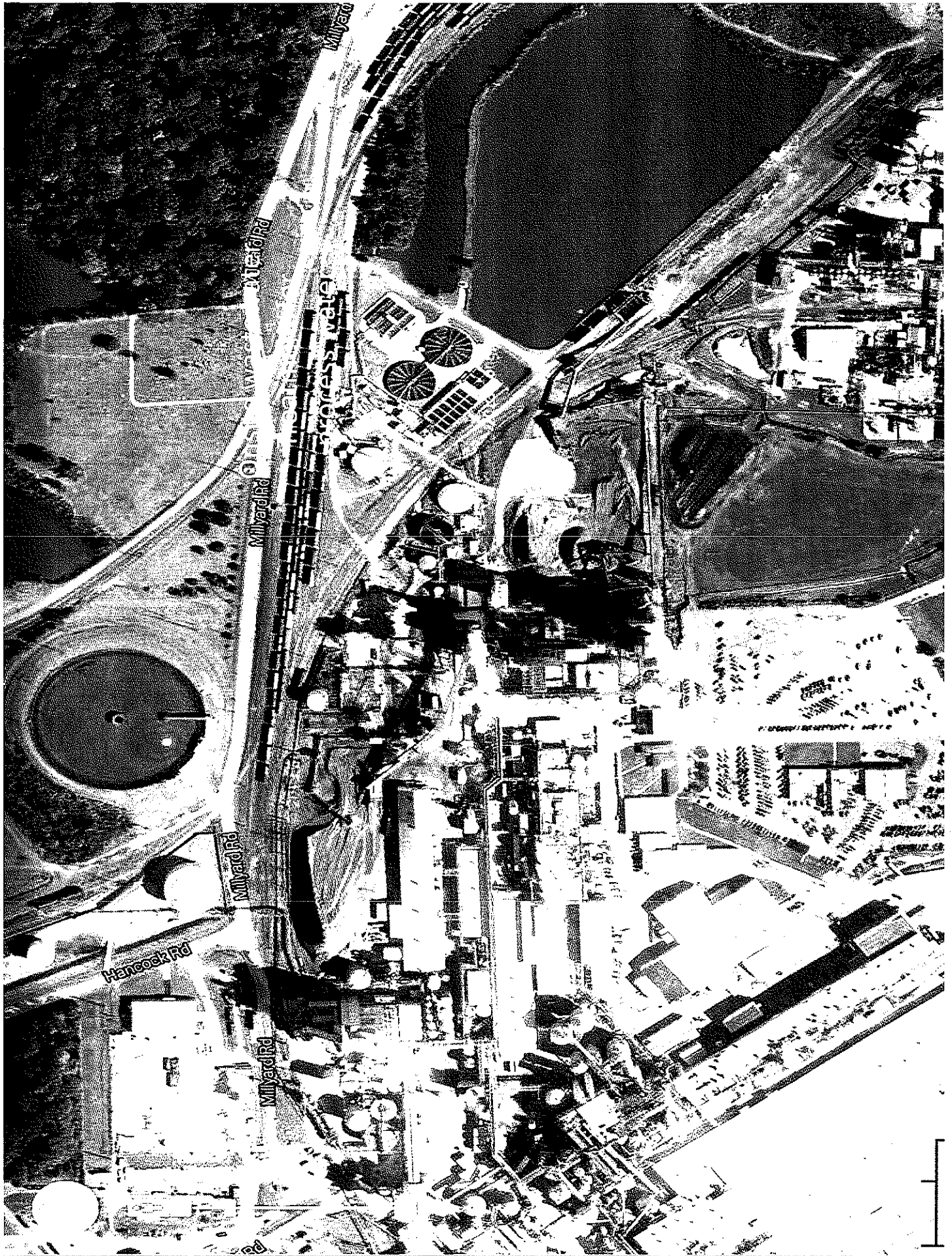
Crossett, Arkansas

ARD035466648



Information from RCRAInfo

- Large Quantity Generator
- No RCRA Permit – or CA Orders
- EPA CEI Inspection of **4/10/12** due to citizen complaint – no violations noted -
- State CEI **5/28/2009** with violations to 265.52(d), 265.52(e) [contents of Contingency Plan under Emergency Planning] and 279.22(c) [used oil storage]
- State CEI **2/17/1999** with one violation Reg 23 Section 262.34© (1) (ii) [HW Satellite accumulation area not marked]
- Process water is treated in an on-site wastewater treatment system
- **4/10/12 inspection** closely reviewed management of spent black liquor to determine compliance with the solid waste exclusion





Red Arrows on each slide
Show storm water drainage
to Coffee Creek

